Portland Harbor

Road to ROD Activities

Activity	Tasks	Due Date	Lead	Support	Comment
Source Control	Review Source Control documents	Ongoing	Rich	CDM	Track progress for proposed plan and ROD compatibility. Tech Memo evaluating adequacy of source control by ROD.
	Manage CDM Contract for Source Control Support	Ongoing	Rich		Deliberative Process / Ex. 5
	Manage JSCS IAG w/DEQ	Ongoing	Rich		Ensure funding of IAG and adequacy of work performed.
	Manage Upland IAG w/Tribes	Ongoing	Rich (new)		Ensure funding of IAG and adequacy of work performed.
	Coordinate with DEQ and City on Storm water Source Control	Ongoing	Rich		
	Evaluation of Source Control for Proposed Plan	December 2014	Rich		DEQ is expected to give source control report to EPA by May 2013. The City is preparing separate report on stormwater.
	U.S. Moorings uplands Action		Rich (new)		Draft AM to remove contaminated erodible soil. Groundwater waiting on Gasco source control. Corps may need to remove a dock.

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	McCormick & Baxter		Rich	CDM	5-year reviews
	Triangle Park/Habitat Restoration		Sean	CDM	
	Gould		Rich	CDM	Next 5-year review in 2018.
	Arkema		Sean	CDM	
	Watershed Activities (coord. With OWW, other EPA programs	2/28/12 Kick off meeting with team	Mary Lou Soscia Lori Cohen	Rich, Kristine Lori Cora	
					Deliberative Process / Ex. 5
Community Outreach	CAG meetings	Ongoing monthly	Alanna and Rich (new)	Depends on topic, other EPA PH team	Coordinate topics with CAG. Plan to have 3 meetings on FS as sections are completed and one or more meetings on Remedy Concept.

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	Track and meet w/ local organizational activities	Ongoing	Alanna		Help get EPA messages out regarding RI/FS topics.
	Track OHA activities	Ongoing	Alanna	Elizabeth	Coordinate with Karen Bishop on messaging. Key message is that risks to people eating fish needs to be reduced to allow people to gain benefits. Willamette Cove workgroup needs tracking.
	Update Community Relations Plan	Ongoing at critical points in project	Alanna		Ramp up due to RI, FS, PP. Be proactive on press releases, edit. Boards, etc.
	Manage TAG Grant	Ongoing	Alanna		Ensure funding of TAG and adequacy of work performed.
	Develop Messages to outside entities	Ongoing	Alanna	Mark M.	Deliberative Process / Ex. 5
	Media Inquiries	Ongoing	Mark M.	Appropriate PH staff	
Early Actions	River Mile 11E Early Action	Ongoing	Sean	CDM	Oversight of field work activities.
	Gasco/Siltronic Early Action and Source Control		Sean	CDM	EE/CA development dependent on FS finalization of critical elements. Will be complete prior to ROD.
	T4 Early Action and Source Control		Sean	CDM	Phase I complete. Mitigation for Phase I still needs to be completed. Phase II to occur post ROD.

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	Manage Early Action Contract w/CDM	Ongoing	Sean		Deliberative Process / Ex. 5
Enforcement	Allocation Activities/PRP Search Activities	Ongoing through consent decree negotiations	Lori Cora	Kristine, BAH	Deliberative Process / Ex. 5
	Enforcement Strategy		Lori Cora	Kristine, Deb, Lori Cohen	

Enforcement/Investigatory / Ex. 7(a)

4	Manage PRP contract w/BAH	September 2014	Kristine		Deliberative Process / Ex. 5
	Monitor SEE	June or September 2014	Kristine		Timing will depend on funding. Will retain through funding period.
Remedial Investigation	Finalize RI	Fall 2014	Kristine	Elizabeth, Lori Cora, CDM	Complete Section 5 comments in April 2014. Section 6 is low level review (~2 weeks). Section 10 needs comprehensive revision.

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Feasibility Study	Finalize FS	June 2015. Initial comments to LWG in December 2012. Final comments to LWG by December 2014	Kristine (new)	Sean, Lori Cora, Elizabeth, Burt, CDM, Karl G., Rene	Follow FS strategy and Process that were jointly developed by EPA and LWG. EPA drafting document, LWG and CDM producing technical work to support document.
	Technical coordination meetings w/LWG	November 2014	Kristine, Sean	CDM, Karl G., Elizabeth, Burt, Rene	Technical meetings are held each week with specific topics to discuss based on changes EPA deems necessary to modify the FS. Kristine will attend all meetings, Sean will attend only meetings where he is technical lead.
	Technical coordination meetings w/CDM	Ongoing - weekly	Kristine, Sean	CDM	Coordinate project management for FS development.
	TCT Meetings with MOU Partners	Ongoing – bi- weekly	Kristine (new)	Rich, Sean, Alanna, Elizabeth, Burt, Rene	Discuss project coordination and technical topics.
	Manage IAG w/USACE	Ongoing	Sean (new)		Ensure funding of IAG and adequacy of work performed. This covers review of dredge maintenance plans and Karl G.
	Manage RI/FS Contract w/CDM	December 2014	Kristine (new)		Deliberative Process / Ex. 5
Proposed Plan	Administrative Record	Spring 2015	Kristine	ВАН	
	Develop Remedy Concept	January/February 2015	Kristine, Sean, Rich	PH Team, PH Mgt, HQ	Ni
	Strategy to integrate Source Control and Banks into PP & ROD	Ongoing through PP development.	Kristine (new), Sean, Rich, Cora	Rene, Lori Cora	Upland Bank FSs will be incorporated into PP prior to public participation. DEQ

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					working on SC Summary to be attachment to PP.
	Prepare Remedy Review Board Briefing Materials	Spring 2015	Kristine	CDM, Rich, Sean, Elizabeth, Burt, Cora, Rene	Send to DEQ, LWG, Tribes, CAG 60 days before NRRB/CSTAG meeting. Send to NRRB/CSTAG 30 days before meeting.
	NRRB/CSTAG Meeting	9/2015	Kristine	Sean, Rich, Elizabeth, Burt	Date highly dependent on the FS and the type of remedy.
	Tribal consultation	Before drafting of PP.	Lori/Dennis/Jim W.	Sean/Kristine CDM prep materials	
	Develop Proposed Plan	Fall 2015	Kristine	CDM, PH Team	Deliberative Process / Ex. 5
	Public Meeting(s) and Comment Period	Jan-Mar 2016	Alanna, Kristine, Sean	PH Team	
Record of Decision	Draft Responsiveness Summary	April – September 2016	Kristine	PH Team, CDM	<u> </u>
	ROD	December 2016	Kristine	PH Team	Deliberative Process / Ex. 5

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Project Coordination	Staffing Plan	Spring 2015	Deb, Cami	Lori Cohen	Identify adequate resources in case of personnel changes. Look at external hiring, including IAs. Details, from other agencies. Need to coordinate with RA/DRA.
	Project Coordination Meetings	Ongoing	Kristine	PH Team	Ensure all activities are being completed and coordinated.
	Delib	erative	Proce	ess / Ex.	5
<u>i</u>	Congressional Briefings	Ongoing through ROD.	Dennis, Schuster	Lori Cohen, PH Team	Briefing for key staff on EPA perspectives on the FS. Identify any key concerns/issues. Update Staffers on progress. Brief on PP after release to public.
	Coordination with trustees on NRDA claim	Ongoing	Sean	Kristine	Deliberative Process / Ex. 5
	EPA/DEQ Sr Managers Meeting	Ongoing through PP, through ROD as needed	Deb, Lori Cohen	Kristine, other PH Team per topic	Coordination with State on Policy Issues, including ground water. Need to send clear message to DEQ on ARARs.
	EPA/LWG Sr Mgr Meetings	Ongoing through PP	Deb, Lori Cohen	Kristine	Quarterly updates on progress and discuss any technical issues raised.

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EPA/LWG Ex	ec. Bi-annual through	Dennis, Jim	Deb, Kristine	Update on progress and discuss
Meetings	PP	Woolford, Lori		policy issues and big picture
		Cohen		issues.
EPA/MOU Pa:	rtners Bi-annual through	Dennis, Jim	Kristine	Update on progress and discuss
Meetings	PP	Woolford, Lori		policy issues and big picture
		Cohen, Deb		issues.

PH Team (4.2 current FTE – down 0.8 FTE)

Kristine Koch	Project Manager – RI/FS	1.0 FTE
Sean Sheldrake	Project Manager – Early Actions, FS Support/Tech lead	0.5 FTE
Rich Muza	Project Manager – Source Control, RI/FS Support	0.75 FTE
Karl Gustavson	USACE	NA
Lori Cora	Legal Counsel	0.6 FTE
Alanna Conley	Community Involvement Coordinator	0.9 FTE
Elizabeth Allen	Human Health Risk Assessor	0.8 FTE
Burt Shephard	Ecological Risk Assessor	0.2 FTE
Rene Fuentes	Hydrogeologist	0.25 FTE
Mark MacIntyre	Media Coordinator	0.1 FTE

PH Management

Deb Yamamoto Unit Manager (Kristine & PH ROD) Shawn Blocker Unit Manager (Sean & NTCRA)

Cyndy Mackey
Cami Grandinetti
Lori Cohen

Unit Manager - ORC
Remedial Branch Chief
Associate Office Director

Rick Albright Office Director

Dennis McLerran Regional Administrator

HQ Team

Steve Ells Chair, Contaminated Sediments Technical advisory Group, Science Policy Branch, ARD

Silvina Fonseca Remedial Decisions Team Leader, SARDB, ARD

Robin Richardson Acting Deputy OSRTI Director

Doug Ammon Chief, Site Assessment and Remedy Decisions Branch (SARDB), ARD

Jim Woolford Director, OSRTI

Dana Stalcup Acting Director, Assessment and Remediation Division (ARD), OSRTI

David Charters Environmental Response Team

Amy Legare Chair, National Remedy Review Board, SARDB, ARD

• Agreement on Messaging

- o There is unacceptable risk to human health and the environment and action is necessary at Portland Harbor.
- o Upper Columbia River consumption study results are irrelevant to Portland Harbor. Tribal consumption rates based on CRITFC Study which is scientifically sound and more relevant and appropriate to Portland Harbor.
- o RI and FS are not acceptable. EPA and LWG will be working together to correct the RI and FS. It is more efficient to correct section by section rather than trading voluminous document revisions.
- There has been a significant amount of work accomplished and a significant amount of analysis exists to get us to a remedy decision. The draft FS itself falls quite a bit short of the mark, however. Because the clock is ticking, EPA needs to figure out how it can move forward to get a proposed plan out in beginning of 2016.
- o EPA will need to draft a significant amount of the next draft FS, with significant technical support from LWG. We believe this will be the most efficient process to finalize the FS. As you should be aware, we are revising the RI. We trust there will be cooperation and support from Respondents. One thing we know, we will not meet the schedule if there are disputes and obstacles put in front of us as we finalize the RI and FS.
- O After the significant amount of dialogue and information gathering over the past 12 years, EPA has a good base of information and knows what information is needed for the RI and FS to be clear, transparent, and defensible. We don't think the past process of document submission, commenting, comment resolution, redrafts will be the most efficient process for finalizing the draft documents.
- o We will be more directive on what we will need from the LWG. Directed comments must be addressed without a lot of discussion or time is lost.
- We want to continue the open dialogue during the revision process, we will include the LWG in the process as much as we can. But if involving the LWG in our revision process results in elevations and obstacles for the RPMs to get their work done, we won't be able to involve you until we have a finished draft.
- o The success or failure of meeting the schedule is as much in the hands of the LWG as EPA.

• Completion of RI and FS by Fall 2013

- o Baseline Risk Assessment. BHHRA finalized in April 2013. BERA finalized in December 2013.
- Remedial Investigation Report. RI has major issues with text and data presentation. Revising text and data presentation. Some sections require editing while others require complete revision. EPA is to provide LWG with preliminary drafts of sections as they are completed by EPA with 30 day review and comment resolution periods.
- Feasibility Study. Initial review has been completed. We sent letter that FS is not approved and provide overarching comments in December 2012. Current thinking is that EPA will not direct the LWG to revise the draft FS; EPA will complete major portion of work and will direct LWG to perform certain tasks. Need to control the LWG's overreaction on this aspect.
- **Key message**. Our changes are about acceptability of document vs. fatal flaws. Must be able to understand how they did the work, readability of document is important. They tended to make statements that they did this because EPA made them rather than discuss the reason that a direction was given. Changes are also

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necessary to be consistent with guidance. Also taking the legal slant and unsupported statements out of the RI and FS.

Deliberative Process / Ex. 5

Enforcement Strategy

Enforcement/Investigatory / Ex. 7(a)

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